

May 15, 2014



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Deb Sedwick, Vice  
Chair

Keith Wallace  
California Department of Water  
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El Dorado County Water  
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Sacramento Municipal Utility  
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Sacramento Regional County  
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Subject: Comments on Draft 2014 IRWM Drought Solicitation

Dear Mr. Wallace:

The Regional Water Authority (RWA) appreciates the opportunity to comment on the Department of Water Resources' (DWR) draft 2014 IRWM Drought Proposal Solicitation Package (PSP). Overall, we are pleased with DWR's recognition of the seriousness of the current drought conditions and your desire to get funds released quickly to the most impacted areas of the state.

With respect to the process, we have the following comments:

- We encourage DWR to maintain the aggressive schedule for submitting and evaluating applications that it proposed in the draft PSP. There are significant opportunities to mitigate against the effects of the drought with quick responses.
- We appreciate that DWR has not established a set funding cap for any given application or funding region. Some areas are significantly more impacted than others from the current drought. We understand that the Proposition 84 funding area allocations will still need to be enforced over the course of the IRWM grant program.
- For any funding area with more than one regional water management group, some funding should be maintained for the final round of IRWM grants. This will help ensure implementation over a broad range of projects over the course of Proposition 84 IRWM implementation. We recommend that a minimum of 25 percent of current remaining funds be preserved in any given funding area for a final round of IRWM implementation grants.
- We appreciate DWR's attempts at streamlining the application, but we also encourage you to consider further streamlining. This can be done by eliminating some of the criteria at the project level evaluation as shown in Table 9 of the draft PSP. We suggest eliminating annualizing physical benefits (Q14) and consideration of least cost alternative (Q17). These traditional measures of a project are not as relevant for the solicitation at hand, as the projects are targeted at responding to and preparing for ongoing drought. In addition project performance (Q19 and Q20) can be deferred until after grant award. This will reduce costs for many regional water management groups, particularly during this time of reduced revenues resulting from reduced water usage by customers. This will also allow RWMGs to meet the shorter application

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submittal time. We recommend that DWR attempt to review and remove any information that is not specifically required to evaluate the proposal or is not legislatively mandated. By eliminating or deferring the above criteria, this would result in a 20 point project level evaluation.

We also have comments listed below on components of the application. These comments are also referenced relative to Table 9 of the draft PSP.

- Questions 1 and 2. The 500 word limit is very restrictive. Figures may be beneficial to conveying the story. The drought conditions and our regional response are quite complex. We suggest a five-page limit.
- Question 12. As stated, the criteria would require that the project proponent be at risk of not meeting drinking water requirements. Part of our regional response is that some project proponents are in a position to help others within the region. This may be true for other regions. We suggest that this question be modified so that either the project proponent or the water user identified to receive water from the project address whether they are at risk of not supplying drinking water.

We appreciate the opportunity to comment, and would be happy to discuss any of these further with you.

Sincerely,



John Woodling  
Executive Director